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Attorney for Defendant
Protective Life Insurance Company

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MILAD ISKANDER,

Plaintiff,

v.

PROTECTIVE LIFE INSURANCE
COMPANY and DOES 1 through 10,

Defendants.

Case No. 2:25-cv-01150-DJC-CKD

**STIPULATION AND ORDER
REGARDING AMENDED COMPLAINT,
RESPONSIVE PLEADING DEADLINE**

Complaint filed: March 17, 2025

STIPULATION

Plaintiff Milad Iskander and Defendant Protective Life Insurance Company (“Protective”), by and through their undersigned counsel, hereby stipulate and agree as follows:

Whereas, on March 17, 2025, Plaintiff filed the above-captioned action in the Superior Court of the State of California for the County of Solano under Case No. CU25-02464.

Whereas, on March 20, 2025, Protective was served with a copy of the Complaint and the Summons issued by the state court.

Whereas, on April 18, 2025, Protective filed a Notice of Removal in this court, removing this action from state court to federal court.

Whereas, pursuant to Rule 81(c)(2) of the Federal Rules of Civil Procedure, Protective’s deadline to file a responsive pleading is April 25, 2025.

Whereas, on April 21, 2025, this matter was assigned to the Honorable Daniel J. Calabretta and the parties were provided with a copy of Judge Calabretta’s Standing Order.

Whereas, on April 22, 2025, counsel for Protective, acting pursuant to Judge Calabretta’s Standing Order I.C., sent a meet and confer letter to counsel for Plaintiff informing Plaintiff that Protective intends to file a motion to dismiss under Rule 12(b)(6) of the Federal Rules of Civil Procedure, explaining the bases for the forthcoming motion, and inviting further meet and confer communications.

Whereas, following further meet and confer communications, counsel for Plaintiff informed counsel for Protective that Plaintiff would prefer to amend the Complaint rather than engage in motion practice.

NOW, THEREFORE, Plaintiff and Protective hereby stipulate and agree as follows:

1. Plaintiff shall file an amended complaint on or before May 16, 2025.

2. Protective shall file a responsive pleading to the amended complaint on or before May 30, 2025.

3. Protective has no obligation to file a responsive pleading to the original Complaint and shall not be deemed defaulted by its failure to file a responsive pleading within the deadline imposed by Rule 81(c)(2).

Dated: April 24, 2025

MAYNARD NEXSEN LLP

By: /s/ James J. Hockel
JAMES J. HOCKEL
Attorney for Defendant
Protective Life Insurance Company

Dated: April 24, 2025

LAW OFFICE OF NICHOLAS R. WEBB

By: /s/ Bryan R. Smith
(as authorized on April 24, 2025)
NICHOLAS R. WEBB
BRYAN R. SMITH
Attorneys for Plaintiff
Milad Iskander

IT IS SO ORDERED.

Dated: April 25, 2025

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE